

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

PARKER PELHAM, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

VBIT TECHNOLOGIES CORP., VBIT MINING  
LLC, ADVANCED MINING GROUP, DANH  
CONG VO A/K/A DON VO, PHUONG D VO A/K/A  
KATIE VO, SEAN TU, JIN GAO, LILLIAN ZHAO,  
AND JOHN DOE INDIVIDUALS 1-10, AND DOE  
COMPANIES 1-10,

Defendants.

C.A. No.: 23-cv-162-CFC-SRF

CLASS ACTION

**DECLARATION OF BRIAN E. FARNAN IN SUPPORT OF CROSS MOTION TO  
ALLOW ALTERNATIVE SERVICE AND OPPOSITION TO PHUONG D VO'S  
MOTION TO DISMISS**

I, Brian E. Farnan hereby declare under penalty of perjury:

1. I am an attorney of Farnan LLP, proposed Liaison Counsel in this action, and have personal knowledge of the facts set forth herein. I am duly admitted to practice law in the State of Delaware and before this Court. I make this Declaration in support of the Cross Motion to Allow Alternative Service and Opposition to Phuong D Vo's Motion to Dismiss.

2. Attached hereto as Exhibit 1 is a true and correct copy of all attempts at serving the summons on Phuong D Vo and the affidavits of non-service.

3. Attached hereto as Exhibit 2 is a true and correct copy of the affidavit of Ha Sung Kim.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: November 29, 2023

/s/ Brian E. Farnan  
Brian E. Farnan